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October 31, 2020

VIA ECF

Hon. Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

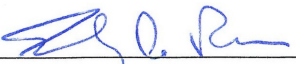
Re: Perez et al v. Sunflower Amsterdam LLC et al.; 18-cv-5875

Dear Judge Ramos

My firm represents Plaintiffs in the above-captioned case. While preparing Order to Show Cause papers to file tomorrow, November 1, 2020, in accordance with the Court's Order of October 2, 2020, I was advised by our IT specialist that our system was subject to a computer virus and I would no longer be able to use my work computer until the issue was resolved. While he is working to restore access, the undersigned currently does not have the ability to access the files necessary in order to comply with Your Honor's order and does not know with certainty when access will be possible.

This is the third request for an extension of this nature. The first was requested due to counsel learning of the passing of plaintiff Ramiro Rojas Roman. The second was requested to allow time to determine whether Plaintiff Roman's estate would pursue his claims. This third request is respectfully made for a very brief extension of one week in order to file the Order to Show Cause in order to rectify this very sudden and unexpected technological issue.

The request is GRANTED. Plaintiffs are instructed to move for a default by no later than November 9, 2020. SO ORDERED.



Edgardo Ramos, U.S.D.J
Dated: 11/2/2020
New York, New York

Respectfully Submitted,

/s/
Clela A. Errington, Esq.
MICHAEL FAILLACE & ASSOCIATES, P.C.
Attorneys for Plaintiff